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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN DOE,

Plaintiff,

v.

JIA LUN SHAO a/k/a ANDY SHAO and JINGYUN
WANG a/k/a VIVIAN WANG

Defendants.

Case No. 2:24-cv-09972

DECLARATION OF JOHN DOE

I, John Doe, being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request to proceed under the pseudonym “John Doe[.]”

2. I request the court permit me to bring this case as “John Doe” for several reasons.

3. Jia Lun Shao a/k/a Andy Shao (“Andy Jia Lun Shao”) and Jingyun Wang a/k/a Vivian Wang (“Vivian Jingyun Wang” and, with Andy Jia Lun Shao, “Defendants”) have devoted the better part of a year to destroying my reputation.

4. First, they sent an e-mail to my employer and dozens of other members of my firm in which they accused me of factual, detailed and entirely false sexual improprieties resulting in me being placed on customary administrative leave. That e-mail was then uploaded onto social

media which led to countless former and current colleagues, friends, and acquaintances contacting me to inquire about the claims against me.

5. I endured and prevailed in an investigation into the allegations at work, but even that did not satisfy Defendants. They continued to e-mail my employer – including the CEO of the company – as well as dozens of co-workers, members of major press, and my girlfriend. Their allegations against me grew more and more absurd: that I raped multiple women and got at least one pregnant; that I am breaching various laws and duties, professionally; that I said terrible things about my significant other and her family.

6. Defendants had no qualms concocting big and small stories about me just as long as they were sufficient to cause me strife.

7. As if that were not bad enough, they began relentlessly harassing me and a character and fact witness who spoke on my behalf to my employer. That woman – who I call Miss X to avoid further harming – was also attacked, reputationally and physically, by Defendants. Miss X also paid dearly for speaking up against Defendants – they e-mailed her law school, the law firm from which she received an internship offer, and many others to claim she violated academic codes, cheated on her boyfriend, and even that I impregnated her. In one e-mail Defendants insinuated and boasted about being responsible for a car hitting her.

8. Defendants' reason for doing all this? Because Vivian Jingyun Wang did not receive the performance rating she had desired at work and was outspoken in believing I was responsible for this. Privately, she blamed me for not showing her favoritism and for her getting what she viewed as a “disappointingly fair” performance rating. As the Complaint explains, I was not responsible for determining her rating. Nonetheless, her personal beliefs and angers culminated in her desire to hurt me for revenge.

9. But now, because of Defendants' relentless and highly public scheme of retaliation, I will forever be followed by a cloud of skepticism. All these years of hard work and respectful behavior forever tarnished because someone refused to accept a fair employee performance rating which was not even determined by me.

10. Defendants have not only attempted to ruin my life but the life of those who support me as well, including my girlfriend and a former friend of theirs – Miss X – who bravely disclosed Defendants' plan to my employer only to face the brunt of their harassment for speaking the truth.

11. Defendants have caused me to miss out on opportunities at work. They have caused me to experience stress, anxiety, and sleepless nights wondering whether I would be fired and alienated from those in my life, and now wondering how many people still believe Defendants' lies.

12. Defendants have ruined year-end plans I made with my girlfriend simply because I was too overwhelmed and depressed to be present in the way I wanted to be. They have caused me to be hypervigilant about any interactions with subordinates for fear that something will be misconstrued. They have made me hesitant to make connections and help associates at work – male and female – who I otherwise would have mentored. Defendants have changed me into a cynical person.

13. When I see someone whose name appeared on the recipient list of one of Defendants' e-mail blasts I am embarrassed. I never know whether to confront Defendants' allegations head on or simply hope the person did not open the e-mail.

14. I fear I will never be able to free myself from Defendants' falsities.

15. While I desperately want everyone to move on from this and forget everything they read in those e-mails and social media posting, I also cannot stand the thought of Defendant Andy

Jia Jun Shao and Defendant Jingyun Wang continuing to do this to me, my girlfriend, Miss X, and whoever else offends them in the future.

16. The finance and banking industry – though sizeable – can be remarkably small depending on where you work, what your specialty is, and what you do. As evidenced by Defendants’ blast e-mails and social media post quickly resulting in dozens of colleagues contacting me about the claims, word spreads fast.

17. Filing a lawsuit using my true name will only further link my name to the bad acts of which they falsely accuse me. Worse yet, there is little doubt that Defendants will use the docket as a tool for punishment – publicly accusing me of who knows what else to intimidate me into walking away from this case.

18. Indeed, if forced to forever link my name to these vile accusations on a public docket, I may very well be left with no choice but to not move forward with this lawsuit and be deprived of justice.

19. Viewing the entirety of Defendants’ claims about me under a critical lens makes clear that Defendants had no basis to believe any of what they were saying about me. Despite this, they used anonymous e-mail addresses to blast e-mails to dozens of individuals while holding themselves out to be some group of women who I had victimized. No such group ever existed.

20. Once caught, Defendants contacted Miss X and me claiming they determined their allegations were “deemed to be lacking in evidence.” Defendants stated their entire defamation campaign was based on “complaints stating [Miss X] has evidence...but she denied upon our investigation.” Ridiculously, they also claimed the “original email” was only sent to Miss X and me.

21. Defendants' so-called apology does not make sense. Defendants were the ones who introduced Miss X to me and Miss X is the one who willingly came forward to alert my employer as to Defendants' scheme. More obvious than that is the fact that their original e-mail had dozens of recipients *and* was uploaded onto a popular social media platform, resulting in me getting placed on customary administrative leave.

22. Defendants are attempting to re-write history to evade liability, but they cannot.

23. It is baffling to me how two people can make such demonstrably false statements seemingly without any shame. Defendants' disregard for the truth makes me immensely fearful of what they would be willing to put on a public docket just to upset me.

24. I spent my entire life building my career, and my name and reputation would be ruined if Defendants were allowed to continue to dream up new false allegations about me in public filings.

25. Forcing me to forever link my name to Defendants' claims would only give Defendants exactly what they sought out to accomplish – my complete and utter humiliation – and would also cause me more trauma and stress.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 18, 2024
Hong Kong SAR, PRC

John Doe
JOHN DOE